

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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In Re: : Chapter 11  
GENERAL MOTORS CORP., et al., :  
: Case No.: 09-50026 (REG)  
: (Jointly Administered)  
Debtors :  
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**OBJECTION OF BURTON TAFT, ADMINISTRATOR OF THE ESTATE  
OF BRIAN TAFT TO THE DEBTORS' MOTION PURSUANT TO  
11 U.S.C. §105, 363(b), (f), (k), AND (m), AND 365  
AND FED.R.BANKR.P. 2002, 6004, AND 6006, TO (I) APPROVE  
(A) THE SALE PURSUANT TO THE MASTER SALE AND PURCHASE  
AGREEMENT WITH VEHICLE ACQUISITION HOLDINGS, LLC,  
A U.S. TREASURY-SPONSORED PURCHASER, FREE AND CLEAR OF  
LIENS, CLAIMS, ENCUMBRANCES, AND OTHER INTERESTS;  
(B) THE ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY  
CONTRACTS AND UNEXPIRED LEASES; AND (C) OTHER RELIEF;  
AND (II) SCHEDULE SALE APPROVAL HEARING**

Burton Taft, Administrator of the Estate of Brian Taft, by  
and through his counsel, Roth & Dempsey, P.C., hereby objects to  
the Motion of Debtors described above as follows:

1. On June 1, 2009, General Motors Corporation ("GM") filed  
a Voluntary Petition for Relief under Chapter 11 of Title 11 of  
the United States Code (Bankruptcy Code).

2. On June 1, 2009, GM filed a Motion to approve the sale  
of substantially all of its assets to Vehicle Acquisition  
Holdings, LLC free and clear of liens, claims, encumbrances, and  
other interests.

3. Your Objector, Burton Taft, Administrator of the Estate  
of Brian Taft, has an action pending in the United States  
District Court for the Middle District of Pennsylvania at 3:08-

CV-2142. The aforementioned action seeks recovery from GM for the wrongful death of Brian Taft which was caused by GM.

4. Brian Taft died when the GM vehicle which he was driving was broadsided by another vehicle and exploded causing Brian Taft to suffer severe fire related injuries and death. He is survived by a wife and two (2) young children.

5. Allowing the intended sale of substantially all of GM's assets free and clear of all liens, claims, encumbrances and other interests, including the interests of Burton Taft as the Administrator for the Estate of Brian Taft, would deprive Burton Taft of his ability to pursue and recover sufficient damages from GM on behalf of the Estate of Brian Taft.

6. Allowing such a sale is contrary to Pennsylvania law which provides for successor liability.

7. Accordingly, Burton Taft, Administrator of the Estate of Brian Taft objects to the Debtors' proposed sale of substantially all of its assets free and clear of all liens, claims, encumbrances and other interests.

**WHEREFORE,** Burton Taft, Administrator of the Estate of Brian Taft respectfully requests that this Honorable Court sustain its objection in its entirety and overrule the Debtors' Motion to the extent the relief requested is inconsistent with this objection

and provide such other relief as this Honorable Court deems just  
and appropriate.

Respectfully submitted,

/s/ Michael G. Gallacher, Esquire

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MICHAEL G. GALLACHER, ESQUIRE

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**CERTIFICATE OF SERVICE**

I, Michael G. Gallacher, Esquire, hereby certify that a true and correct copy of the Objection of Burton Taft, Administrator of the Estate of Brian Taft to the Debtors' Motion Pursuant to 11 U.S.C. §105, 363(b), (f), (k), and (m), and 365 and Fed.R.BankR.P. 2002, 6004, and 6006, to (I) Approve (A) the Sale Pursuant to the Master Sale and Purchase Agreement with Vehicle Acquisition Holdings, LLC, a U.S. Treasury-sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing was caused to be served by electronic mail upon all parties who receive electronic notice in this case pursuant to the Court's ECF Filing System and by overnight mail to the following:

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Respectfully submitted,

/s/ Michael G. Gallacher, Esquire

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